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May 14, 2020

Via Electronic Filing

Hon. Leda Dunn Wettre, U.S.M.J.
United States District Court
District of New Jersey
M.L.K., Jr., Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Yasmine Coello v. City of Linden, et al.
Civil Action No.: 2:20-cv-01682-SDW-LDW

Dear Judge Wettre:

Please be advised that I represent Defendants, City of Linden, Nicholas P. Scutari, Richard J. Gerbounka, and Louis M.J. DiLeo in connection with the above-referenced matter. Pursuant to the terms of Judge Wolfson's Standing Order 2020-09, the time for my filing a response to Plaintiff's Complaint has been extended to June 4, 2020. On May 13, 2020, I had a telephone conference with Plaintiff's attorney and the attorney representing Defendant Kathleen Estabrooks. Defendant Estabrooks has filed a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6) which currently has a return date of June 1, 2020. During the course of our phone conference, I indicated to counsel that I too would be filing a motion to dismiss. It was agreed that I would write a letter to Your Honor, with the approval of all counsel, to request that once my motion is filed, both my motion and co-defendant's motion receive the same return date so that the time for the filing of Plaintiff's opposition and any reply briefs will be put on the same schedule.

We seek Your Honor's guidance as to how to accomplish this goal. We are all available for a phone conference to discuss this matter with you. On behalf of all counsel, we appreciate your consideration in this matter.

Respectfully submitted,

LACORTE, BUNDY, VARADY & KINSELLA

By: s/Robert F. Varady

Robert F. Varady, Esq.

cc: All counsel (via electronic filing)